

# **Exhibit 1**

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**From:** Claudia Wilner  
**Sent:** Wednesday, January 22, 2020 2:32 PM  
**To:** Quinn,Robert E  
**Cc:** Travis England ; Darius Charney  
**Subject:** Revised List of Custodians and Search Terms  
Rob,

We write pursuant to the court's December 19, 2019, Opinion and Order, to provide you with a list of 20 priority search terms that are compatible with Defendants' email systems, along with 20 priority custodians on which we request that you run the searches.

We also include an alternative list of complex search terms (the same terms we sent previously). In the event you decide to hire an e-discovery vendor after all, we request that you have the vendor use the complex terms, which are compatible with their systems and promote a more efficient search and production process.

Pursuant to the court's Order, we will expect an initial production within 20 days, with rolling productions thereafter. Note that pursuant to the court's Order, you must produce documents in a text-searchable format, including information reflecting the date and time at which emails were sent and received, the sender, and all recipients (including any copied and blind-copied recipients).

We will be happy to discuss this matter on today's call if you have any questions.

Talk to you soon.

Claudia Wilner  
Senior Attorney  
NCLEJ

*Revised List of Custodians and Search Terms*  
*January 22, 2020*

***Black Love Resists v. City of Buffalo et al.***

**List of 20 Custodians**

1. Byron B. Brown
2. Byron C. Lockwood
3. Daniel Derenda
4. Aaron Young
5. Kevin Brinkworth
6. Philip Serafini
7. Jeff Rinaldo
8. Capt. Patrick Mann
9. Kimberly Beatty
10. Tracy Maciello
11. Kevin Helfer
12. Danielle Morgera
13. Lt. Lance R. Russo
14. Lt. David Wilcox
15. Lt. George McLean
16. Lt. Thomas Whelan
17. Lt. Daniel Burke
18. Lt. Michael Quinn
19. Lt. Brian Strobele
20. Capt. Patrick Roberts

**List of Simple Search Terms**

Search Term	Includes
BMHA	BMHA
housing	housing
checkpoint	checkpoint, check point, checkpoints, check points
roadblock	roadblock, road block, roadblocks, road blocks
impound	impound, impounds, impounded
east side	eastside, east side
tint	tint, tints, tinted
tow	tow, towed, towing, tows
discriminat	discriminate, discriminates, discriminated, discriminatory, discrimination,

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rac	race, racial, racist, racists, racism
profil	profile, profiled, profiling
bias	bias, biased
quota	quota, quotas
ticket	ticket, tickets, ticketing, ticketed
traffic stop	traffic stop, traffic stops
lawsuit	lawsuit, law suit, lawsuits, law suits
strike force	strikeforce, strike force
summons	summons, summonses
revenue	revenue, revenues
budget	budget, budgets, budgeted, budgetary

**Alternate List of Complex Search Terms for Use with E-Discovery Vendor**

1. checkpoint~ OR check-point~ OR check w/2 point~
2. roadblock~ OR (road w/2 (block~ OR check~))
3. (vehicle~ OR traffic OR safety) w/2 (check~)
4. safety AND (Traffic OR roadway OR highway OR vehicle)
5. (tint~) w/4 (illegal~ OR window~)
6. traffic AND (study OR calming OR data OR number~)
7. Zero w/4 tolerance
8. (Secondary OR additional) w/4 (stop~ OR interrog\* OR search~)
9. (ticket~ OR violation~ OR tow~ OR impound~ OR citation~) AND (BTVA OR VTL or 479 OR fine~ OR tally OR number OR revenue~ OR fees OR cost OR money OR proceeds OR profit~ OR quota~ OR data OR amount~ OR number OR total OR debt OR enforce\* schedule~ OR list)

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10. (Revenue~ OR fine~ OR fee~) AND (new OR City OR Buffalo OR revise~ OR collect~ OR generate~ OR earn~ OR total~ OR amount OR owe~ OR assess~ OR fund\* OR data OR target)
11. (Budget~ OR fund~ OR revenue~ OR finance\*) AND (traffic OR BPD OR BTVA OR HU OR "Traffic Violations Agency" OR "strike force" OR "housing unit" OR "SF" OR police OR officer~ OR "Law Department" OR government OR parking OR enforce\* OR federal OR legal OR City OR Buffalo OR municipal~)
12. (Train\* OR in-service) AND (traffic OR stop~ OR VTL OR Fourth OR 4th OR Fourteenth OR 14th OR "civil rights" OR bias OR discriminat\* OR roadblock)
13. Complain~ AND (driving OR parking OR vehicle~ OR search~ OR stop~ OR seize~ OR seizure OR impound~ OR ticket~ OR fee~ OR arrest~ OR fine~)
14. (race OR racial OR ethnic\* OR black OR latin\* OR hispanic~ OR mexican~) AND (profil\* OR bias~ OR disparit\* OR discriminat\*)
15. quota~
16. civil /2 right~
17. (Policy OR procedure~ OR policies OR directive~ OR bulletin~ OR order~ OR update~ OR decision~) AND (traffic OR stop~ OR ticket~ OR check-point~ OR checkpoint~ OR vehicle~ OR auto~ OR motor OR search~ OR zero OR hotspot~ OR hot-spot~ OR roadblock~)
18. (Change~ OR modif\* OR amend~ OR levy~ OR assess~ OR impose~ OR revise~) w/6 (traffic OR fine~ OR fee~ OR "BTVA" OR "Buffalo Traffic Violations Agency" OR July OR 2013 OR "Chapter 175" OR "175")
19. (BPD OR police OR officer~ OR ticket~) w/6 (goal~ OR quota~ OR number~ OR "Citi-stat" OR "citistat" OR "city-stat" OR "citystat")
20. ("Attorney General" or AG) AND (investigat\* OR report~ OR contact~ OR complain~ OR sue~ OR record~ OR request~)